



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

AUG - 6 2014

OFFICE OF
COMPLIANCE AND ENFORCEMENT

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Mr. Luke Maynard
Boardman Tree Farm, Greenwood Resources
P.O. Box 870
Hermiston, Oregon 97838

Re: Risk Management Program Compliance Inspection
Boardman Tree Farm, Greenwood Resources
EPA Facility # 1000 0020 4165

Dear Mr. Maynard:

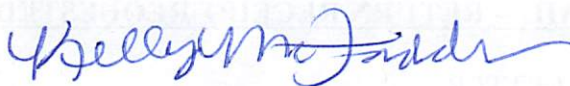
On April 4, 2014, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Boardman Tree Farm facility (BTF) located at 77200 Poleline Road, Boardman, Oregon. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. Boardman Tree Farm failed to determine, in consultation with the employees operating the process, the appropriate frequency of refresher training as required by 40 C.F.R. § 68.54(b).
2. Boardman Tree Farm failed to document that owner or operator certified that compliance audits are conducted at least every three years to verify that the procedures and practices are adequate and are being followed as required by 40 C.F.R. § 68.58(a). The compliance audit dated December 2013 was completed more than three years after the prior compliance audit.
3. Boardman Tree Farm failed to promptly determine and document an appropriate response to each of the findings of the audit and did not document that deficiencies had been corrected as required by 40 CFR 68.58(d). The compliance audit dated December 2013 was not tracking the completion of the audit findings.

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: http://www.epa.gov/emergencies/content/rmp/rmp_guidance.htm#General

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or morales.javier@epa.gov.

Sincerely,



Kelly McFadden, Manager
Pesticides and Toxics Unit